

## **REMARKS**

Claims 1-12 were pending in the Application prior to the outstanding Office Action. In the Office Action, claims 1, 5, 6, 9, 11 and 12 were rejected under 35 U.S.C. §112(a). Claims 2, 3, 4, 7, 8, and 10 were rejected under 35 U.S.C. §103(a). Applicants will address each basis of rejection in sequence.

### **I. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §102(a)**

In paragraph 2 of the Office Action mailed October 8, 2004, the Examiner rejected claims 1, 5, 6, 9, 11, and 12 under 35 U.S.C. §112(a), second paragraph as being anticipated by U.S. Patent No. 6,138,721 issued to Bonora *et al.* ("*Bonora*") and U.S. Patent No. 6,281,516 issued to Bacchi *et al.* ("*Bacchi*"). Applicants have cancelled claims 10-12 for reasons other than patentability and therefore, no response is provided with respect to the Examiner's rejections of claims 10-12.

*Bonora* discloses a load port 13 that secures to the front end of a tool through a BOLT interface plate 12. The load port 13 shown in Figs. 1-2 includes, among other things, a mounting plate 10, a FOUP advance plate assembly and a "process tool port 15 (shown covered by a port door 17)." *Bonora*, 4:23-24; Figs. 1-2. The port 15 is an opening in the top portion of the mounting plate 10. The FOUP advance plate assembly is secured to the mounting plate 10. To gain access to the interior of the tool, the mounting plate 10 (with the FOUP advance plate assembly attached) must be removed.

*Bacchi* discloses a dual load port system 10 that is able to receive and open two FOUPs 18 simultaneously. The base of the system 10 comprises a "a frame 12 to which two front or port plates 14 are attached." *Bacchi*, 4:16-17. Each port plate 14, which is a flat piece of material, is simply bolted to the frame 12. "Each front plate 14 supports one of two substantially identical load box interface systems 16." *Bacchi*, 4:17-18. Each port plate 14 has an opening 74 to mate with the port door 76. *Bacchi*, 5:12-13. Fig. 12 illustrates that the port door 76 is lowered just far enough to not obstruct the port opening 74, at which point, the port door comes to rest behind the port plate 14 (shown as hidden line 352). The load port system 10 disclosed in *Bacchi* comprises two load ports bolted to a single, common frame 12.

### **Bonora**

#### **A. Independent Claim 1 Patently Distinguishes over *Bonora***

Claim 1, among other things, recites:

“at least two elongated struts, each said elongated strut having an upper portion, a lower portion, a front face, and a rear face;

.....

a structure secured to said lower portion of each said elongated strut, said structure including a front mounting surface secured to and partially covering said front face of each said vertical strut and a rear mounting surface secured to and partially covering said rear face of each said vertical strut, said structure providing a storage area defined by the area located between said front and rear mounting surfaces and each pair of said elongated struts, said storage area for storing the port door when the port door is located in a lowermost position.”

The load port disclosed in *Bonora* does not include a “structure” that provides a “storage area for storing the port door when the port door is located in a lowermost position.” Fig. 2 of *Bonora* shows that the mounting plate 10 of the load port 13 mounts to the BOLTS interface plate 12. The BOLTS interface plate 12 does not include a “storage area” (the frame 12 is simply a thin, rectangular frame). Thus, the port door 17 in *Bonora* is not located in a “storage area” when the port door 17 is located in the lowered position. Therefore, Applicants respectfully suggest that claim 1 is not anticipated by *Bonora*.

**B. Dependent Claim 5 Patently Distinguishes over *Bonora***

Dependent claim 5 depends directly or indirectly from independent claim 1. This dependent claim includes all of the limitations of the independent claim from which it depends. Applicants respectfully assert that dependent claim 5 is allowable for at least the reasons set forth above concerning independent claim 1.

**C. Independent Claim 6 Patently Distinguishes over *Bonora***

Claim 6, among other things, recites:

“at least two elongated struts, each said elongated strut having an upper portion, a lower portion, a front face, and a rear face;

.....

a structure secured to said lower portion of each said vertical strut, said structure having a front mounting surface secured to said front face of each said vertical strut and a rear surface secured to said rear face of each said vertical strut, said structure providing a storage area for storing the port door when the port door is located in a lowermost position; and

wherein said container support assembly is secured to said front mounting surface of said structure.”

For at least the same reasons discussed above with regard to claim 1, claim 6 is not anticipated by *Bonora*.

**D. Dependent Claims 9 Patently Distinguishes over *Bonora***

Dependent claim 9 depends directly or indirectly from independent claim 6. This dependent claim includes all of the limitations of the independent claim from which it depends. Applicants respectfully assert that dependent claim 9 is allowable for at least the reasons set forth above concerning independent claim 6.

**Bacchi**

**A. Independent Claim 1 Patently Distinguishes over *Bacchi***

Claim 1, among other things, recites:

“at least two elongated struts, each said elongated strut having an upper portion, a lower portion, a front face, and a rear face;

.....

a structure secured to said lower portion of each said elongated strut, said structure including a front mounting surface secured to and partially covering said front face of each said vertical strut and a rear mounting surface secured to and partially covering said rear face of each said vertical strut, said structure providing a storage area defined by the area located between said front and rear mounting surfaces and each pair of said elongated struts, said storage area for storing the port door when the port door is located in a lowermost position.”

The load port disclosed in *Bacchi* does not include a “structure” that provides a “storage area for storing the port door when the port door is located in a lowermost position.” Fig. 12 of

*Bacchi* “shows port door 76 in a fully raised position (solid lines) 350 and a fully lowered position (outlined in phantom lines) 352.” *Bacchi*, 10:43-45. The port door 76 in *Bacchi* is not located in a “storage area” when the port door is located in the lowered position 352. Therefore, Applicants respectfully assert that claim 1 is not anticipated by *Bacchi*.

**B. Dependent Claim 5 Patently Distinguishes over *Bacchi***

Dependent claim 5 depends directly or indirectly from independent claim 1. This dependent claim includes all of the limitations of the independent claim from which it depends. Applicants respectfully assert that dependent claim 5 is allowable for at least the reasons set forth above concerning independent claim 1.

**C. Independent Claim 6 Patently Distinguishes over *Bacchi***

Claim 6, among other things, recites:

“at least two elongated struts, each said elongated strut having an upper portion, a lower portion, a front face, and a rear face;

.....

a structure secured to said lower portion of each said vertical strut, said structure having a front mounting surface secured to said front face of each said vertical strut and a rear surface secured to said rear face of each said vertical strut, said structure providing a storage area for storing the port door when the port door is located in a lowermost position; and

wherein said container support assembly is secured to said front mounting surface of said structure.”

For at least the same reasons discussed above with regard to claim 1, claim 6 is not anticipated by *Bacchi*.

**D. Dependent Claims 9 Patently Distinguishes over *Bacchi***

Dependent claim 9 depends directly or indirectly from independent claim 6. This dependent claim includes all of the limitations of the independent claim from which it depends. Applicants respectfully assert that dependent claim 9 is allowable for at least the reasons set forth above concerning independent claim 6.

**II. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §103(a)**

In paragraph 3 of the Office Action mailed October 8, 2004, the Examiner rejected claims 3, 4, 7 and 8 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,281,516 issued to *Bacchi*, and further in view of U.S. Patent No. 6,050,891 issued to Nering et al (“*Nering*”), the Examiner rejected claim 2 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,281,516 issued to *Bacchi* and further in view of U.S. Patent No. 5,613,821 issued to Muka et al. (“*Muka*”) and rejected claim 10 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,138,721 issued to *Bonora* in view of U.S. Patent No. 6,281,516 issued to *Bacchi*.

*Muka* discloses

*Bacchi* in view of *Nering*

**A. Dependent Claims 3 and 4 Patently Distinguish over *Bacchi* in view of *Nering***

Dependent claims 3 and 4 depend directly or indirectly from independent claim 1. Claim 1, among other things, recites:

“at least two elongated struts, each said elongated strut having an upper portion, a lower portion, a front face, and a rear face;

.....

a structure secured to said lower portion of each said elongated strut, said structure including a front mounting surface secured to and partially covering said front face of each said vertical strut and a rear mounting surface secured to and partially covering said rear face of each said vertical strut, said structure providing a storage area defined by the area located between said front and rear mounting surfaces and each pair of said elongated struts, said storage area for storing the port door when the port door is located in a lowermost position.”

As discussed above, the load port disclosed in *Bacchi* does not include a “structure” that provides a “storage area for storing the port door when the port door is located in a lowermost position.” This “storage area” element is also not obvious in view of *Bacchi*. The stage base 406 of the linear traveling robot assembly 400 is mounted directly to the rear surface of each port plate 14. The port door 76 simply moves between an open and closed position between the port plate 14 and the stage base 406. *Bacchi* does not suggest or provide any motivation to include a

“storage area” between the port plate 14 and the stage base 406. Therefore, Applicant respectfully suggests that the frame recited in claim 1 is not obvious in view of *Bacchi*.

Moreover, the frame is not obvious in view of *Nering*. *Nering* discloses a turbo-axial fan unit for providing a clean air supply in a substrate manufacturing environment. *Nering* does not suggest or provide any motivation to provide a “storage area” in the frame 120. Therefore, Applicants respectfully suggest that the frame recited in claim 1 is not obvious over *Bacchi* in view of *Nering*.

**B. Dependent Claims 7 and 8 Patently Distinguish over *Bacchi* in view of *Nering***

Dependent claims 7 and 8 depend directly or indirectly from independent claim 6. Claim 6, among other things, recites:

Claim 6, among other things, recites:

“at least two elongated struts, each said elongated strut having an upper portion, a lower portion, a front face, and a rear face;

.....

a structure secured to said lower portion of each said vertical strut, said structure having a front mounting surface secured to said front face of each said vertical strut and a rear surface secured to said rear face of each said vertical strut, said structure providing a storage area for storing the port door when the port door is located in a lowermost position; and

wherein said container support assembly is secured to said front mounting surface of said structure.”

For at least the same reasons discussed above with regard to claim 1, claim 6 is not obvious over *Bacchi* in view of *Nering*.

*Bacchi* in view of *Muka*

**A. Dependent Claim 2 Patently Distinguishes over *Bacchi* in view of *Muka***

Dependent claim 2 depends directly or indirectly from independent claim 1. Claim 1, among other things, recites:

“at least two elongated struts, each said elongated strut having an upper portion, a lower portion, a front face, and a rear face;

.....

a structure secured to said lower portion of each said elongated strut, said structure including a front mounting surface secured to and partially covering said front face of each said vertical strut and a rear mounting surface secured to and partially covering said rear face of each said vertical strut, said structure providing a storage area defined by the area located between said front and rear mounting surfaces and each pair of said elongated struts, said storage area for storing the port door when the port door is located in a lowermost position.”

As discussed above, the frame recited in claim 1 is not obvious over *Bacchi*. *Muka* does not suggest or provide motivation for a “storage area” in mini-environment 58. The port door 42 is simply lowered into the mini-environment 58. Therefore, Applicants respectfully suggest that the frame recited in claim 1 is not obvious over *Bacchi* in view of *Muka*.

### **Additional Remarks**

The references cited by the Examiner but not relied upon have been reviewed, but are not believed to render the claims unpatentable, either singly or in combination.

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application are allowable, and a Notice of Allowance is requested.

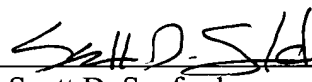
Enclosed is a PETITION FOR EXTENSION OF TIME UNDER 37 C.F.R. §1.136 for extending the time to respond up to and including today, April 1, 2005

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-0639 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: April 1, 2005

By: \_\_\_\_\_

  
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